

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE PULLMAN GROUP, LLC,

Plaintiff,

vs.

Civil Action No. 1:20-cv-07293-GHW

RONALD ISLEY, RUDOLPH ISLEY,
RESERVOIR MEDIA MANAGEMENT,
INC., THE ESTATE OF O'KELLY
ISLEY, J.R., ISLEY BROTHERS, L.L.C.,
ISLEY BROTHERS ROYALTY
VENTURE I SPC, INC., THREE BOYS
MUSIC CORPORATION, BOVINA
MUSIC INC., T-NECK RECORDS, INC.,
TRIPLE THREE MUSIC, INC. AND
JOHN DOE CORPORATIONS 1-5,

Defendants.

**ISLEY DEFENDANTS' NOTICE OF MOTION TO DISMISS
PLAINTIFF'S FIRST AMENDED COMPLAINT**

(ORAL ARGUMENT REQUESTED)

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of their Motion to Dismiss Plaintiff's First Amended Complaint, and upon all pleadings and proceedings herein, Defendants Ronald Isley, Rudolph Isley, The Estate of O'Kelly Isley, Jr., Isley Brothers, L.L.C., Isley Brothers Royalty Venture I SPC, Inc., Three Boys Music Corporation, Bovina Music Inc., T-Neck Records, Inc., and Triple Three Music, Inc. (collectively, "Isley Defendants"), by and through their undersigned counsel, will move this Court, at a date and time to be determined by the Court, before the Honorable Gregory H. Woods, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007, for

an Order dismissing Plaintiff's First Amended Complaint with prejudice, pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: November 30, 2020

Respectfully submitted,

WILLS LAW FIRM, PLLC

/s/ Rhonda H. Wills

Rhonda H. Wills

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ATTORNEY FOR ISLEY DEFENDANTS

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that the foregoing document has been electronically filed with the clerk of the Court by using the CM/ECF system, which will in turn send a notice of the electronic filing to all counsel of record, on this 30th day of November, 2020.

/s/ Rhonda H. Wills

Rhonda H. Wills